



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

ground of greater convenience. *Re Goddard*, 16 Pick. 504, 28 Am. Dec. 259; *Village of Carthage v. Frederick*, 122 N. Y. 268, 25 N. E. 480, 19 Am. St. Rep. 490, 10 L. R. A. 178. Some courts have even gone so far as to say that such ordinances are valid as local assessments under the taxing power. *State v. McMahon*, 76 Conn. 97, 55 Atl. 591; *State v. McCrillis*, 28 R. I. 165, 66 Atl. 301, 9 L. R. A. (N. S.) 635.

The sounder view is that these ordinances are invalid both as police regulations and as special tax assessments, since under the former an unequal burden is imposed upon a certain class of citizens and under the latter no peculiar benefits are received. *State v. Jackman*, 69 N. H. 318, 41 Atl. 347; *Gridley v. City of Bloomington*, 88 Ill. 554, 30 Am. Rep. 566; *McGuire v. District of Columbia*, 24 App. Cas. D. C. 22, 65 L. R. A. 430.

If the duty to keep the pavements clean can be put upon the adjacent landowners why may not the rule be extended to its logical conclusion and they be required to keep the whole street in repair? The principal case seems to have made such an extension and the validity of the decision may well be questioned. It can hardly be maintained that the destruction of noxious weeds in the highway as an aid to the eradication of weeds on the abutter's land constitutes a peculiar and sufficient benefit within the meaning of the tax laws.

NEGLIGENCE—VIOLATION OF CITY ORDINANCE.—The plaintiff while driving at night collided with the defendant's lumber wagon which was not equipped with lights as required by a city ordinance. by reason of which the plaintiff's automobile was damaged. *Held*, the defendant is guilty of negligence *per se*. *Connell v. Harris* (Cal.), 138 Pac. 949. See NOTES, p. 558.

STATUTES OF LIMITATION—CONTEMPORANEOUS WAIVERS.—The defendant executed a bond in which he waived the statute of limitations as to the bond. The plaintiff brought an action on the bond after the time prescribed by the statute had expired. The defendant pleaded the statute in bar of the action. *Held*, he can do so. *Mutual Life Ins. Co. v. U. S. Hotel Co.*, 144 N. Y. Supp. 576. See NOTES, p. 565.